

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JACKIE FISHER

Plaintiff,

vs.

UNIVERSITY OF TEXAS
MEDICAL BRANCH and
DAVID WATSON

Defendants.

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CIVIL ACTION NO. 4:08-cv-01273

Jury Demanded


PLAINTIFF'S ANSWERS TO DEFENDANTS'
FIRST SET OF INTERROGATORIES

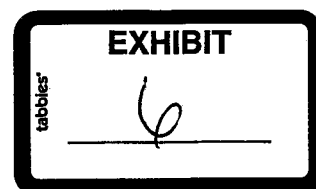
To: Defendants, UNIVERSITY OF TEXAS MEDICAL BRANCH ("UTMB") and David Watson,
through their attorney of record, Sam Lively, P.O. Box 12548, Austin, Texas 78711-
2548.

Plaintiff, Jackie Fisher, serves these answers to Defendants' University of Texas Medical
Branch and David Watson's interrogatories.

Respectfully submitted,

LAW OFFICE OF JO MILLER, P.L.L.C.
505 North Main
Carriage House
Conroe, Texas 77301
Tel: (936) 539-4400
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jmiller@jomillerlaw.com

By: 
JO MILLER
State Bar No. 00791268
Southern District No. 20385
Attorney for Plaintiff, Jackie Fisher



CERTIFICATE OF SERVICE

I, JO MILLER, do hereby certify that a true and correct copy of the *Plaintiff's Answers to Defendants' First Set of Interrogatories* was served on counsel for Defendants on this 28 day of May, 2009 as follows:

Sam Lively
Assistant Attorney General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
sam.lively@oag.state.tx.us
Counsel for Defendants
UNIVERSITY OF TEXAS MEDICAL
BRANCH and David Watson

Via Certified Mail No. 7005 1820 0008 2520 8299



JO MILLER

Attorney for Plaintiff, Jackie Fisher

INTERROGATORIES

INTERROGATORY NO. 1:

Please identify all persons answering or supplying information used in answering these interrogatories.

ANSWER: Jackie Fisher
c/o LAW OFFICE OF JO MILLER, PLLC
505 North Main
Carriage House
Conroe, Texas 77301
936/539-4400

INTERROGATORY NO. 2:

State the name, address and telephone number of each person with knowledge of relevant facts surrounding the allegations in your lawsuit.

ANSWER: OBJECTION IS MADE as this interrogatory requests information which is unreasonably cumulative or duplicative, or is obtainable from some other source that is more convenient, less burdensome, or less expensive, or has already been provided in response to other discovery in another form or to another interrogatory.

Subject to the foregoing objections, please see Plaintiff's Initial Disclosures and all subsequent amendment(s) thereto.

INTERROGATORY NO. 3:

Please describe the nature of the claimed discrimination you assert in this lawsuit.

ANSWER: OBJECTION IS MADE as this interrogatory requests information which is unreasonably cumulative or duplicative, or is obtainable from some other source that is more convenient, less burdensome, or less expensive, or has already been provided in response to other discovery in another form or to another interrogatory—see Plaintiff's Original Complaint.

Subject to the foregoing objections, I contend that I was treated differently than my similarly situated white co-workers. I was retaliated against for making a formal complaint.

INTERROGATORY NO. 4:

State the name, address and telephone number of each employee who has made any oral or written statement which you contend is evidence of discrimination against you and the date and words used by such employee.

ANSWER: OBJECTION IS MADE as this interrogatory requests information which is unreasonably cumulative or duplicative, or is obtainable from some other source that is more convenient, less burdensome, or less expensive, or has already been provided in response to other discovery in another form or to another interrogatory.

Subject to the foregoing objection, please see Plaintiff's Initial Disclosures and all subsequent amendment(s) thereto and the corresponding disclosure documents. Specifically, see emails to and from Mary Gotcher, former Northern Division Director of Nurses; David Watson, former Huntsville District Nurse Manager; and Georgia Melton, former Northern Division Human Resource Administrator.

INTERROGATORY NO. 5:

Please state the name, address and telephone number of each health care professional who has diagnosed or treated you for any damages you claim as a result of Defendant's discrimination.

ANSWER: Jonathan Hulme, M.D.
17125 Red Oak Drive
Suite 110
Houston, Texas 77090
281/537-7784

INTERROGATORY NO. 6:

Please state the name and title of each individual with the defendants whom you contend has discriminated against you.

ANSWER: See Response to Interrogatory No. 4.

INTERROGATORY NO. 7:

Please describe how each such individual named in No. 6 above discriminated against you either in words or actions or omission?

ANSWER: I was treated differently than my similarly situated white co-workers. Omission of responding or investigating my verbal complaints, grievances, or appeals.

Also, see Response to Interrogatory No. 4.

INTERROGATORY NO. 8:

Please describe your economic damages, by nature and amount.

ANSWER:

1. Reduction in pay due to demotion in the amount yet to be determined and loss of pay in the form of raises.
2. Co-payment for doctor's visit(s).
3. Attorney fees.
4. Reasonable and necessary costs of suit.
5. Expert fees as appropriate
6. Prejudgment interest.
7. Front pay in an equitable amount.
8. Loss of benefits, past and future.

INTERROGATORY NO. 9:

Please describe how you calculated these damages?

ANSWER: The salary I earned as Nurse Manager as opposed to the salary I received when I was demoted to Assistant Nurse Manager and the amount of the co-payment required by the insurance company.

INTERROGATORY NO. 10:

Please describe your non-economic damages by nature and amount.

ANSWER: Emotional pain; Inconvenience; Loss of enjoyment of life;
Mental anguish in the past; and Mental anguish in the future;
in an amount to be determined by the jury.

INTERROGATORY NO. 11:

Please describe how you calculated these non-economic damages.

ANSWER: Plaintiff will accept as correct the amount determined by the jury.

INTERROGATORY NO. 12:

Please state the name, address and telephone numbers of any entity or person from whom you have sought employment since leaving Defendant's employment.

ANSWER: This interrogatory is outside the scope of discovery as allowable under F.R.C.P., Rule 26(b)(1) in that it asks for information that is not relevant to the claim or defense of any party.

Subject to the foregoing objection, Plaintiff has not left Defendant's employment.